

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT THOMAS, SCOTT PATRICK HARRIS, MICHAEL BELL, SANDRA PALUMBO, FRANK KARBARZ, and THOMAS DAVIS on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

LENNOX INDUSTRIES INC.

Defendant.

Case No: 13 CV 7747

Hon. Sara L. Ellis

**PLAINTIFFS' AMENDED MOTION FOR LEAVE TO FILE AN OVERSIZED
MEMORANDUM IN SUPPORT OF THEIR MOTION FOR PRELIMINARY
APPROVAL OF THE CLASS SETTLEMENT**

Plaintiffs Robert Thomas, Scott Patrick Harris, Michael Bell, Sandra Palumbo, Frank Karbarz, and Thomas Davis, on behalf of themselves and all others similarly situated (hereinafter referred to as “Plaintiffs”), move for leave to file their memorandum in support of their motion for preliminary approval of the class settlement in excess of the 15-page limit set by Northern District of Illinois Local Rule 7.1. In support of this request, Plaintiffs state as follows:

1. This amended motion corrects the clerical error made in the filing June 26th which omitted the proposed oversized memorandum and missing exhibit B-1(b). Plaintiffs proposed oversized memorandum and complete set of exhibits hereto is attached as exhibit A.

2. Plaintiffs are filing contemporaneously with this motion their motion for preliminary approval of the class settlement and memorandum in support that is 30 pages in length.

3. The length of Plaintiffs' memorandum in support of their motion for preliminary approval of the class settlement is necessary to fully articulate the contours of the settlement agreement between the parties, which will be submitted for this Court's preliminary approval.

4. Plaintiffs have presented the positions in their memorandum as efficiently as possible; however, the extra pages are necessary to fully articulate the parameters of the settlement agreement between the parties.

WHEREFORE, pursuant to Local Rule 7.1, Plaintiffs request that the Court permit them to file their memorandum in support of their motion for preliminary approval of the class settlement that is 30 pages in length.

Dated: June 28, 2015

ROBERT THOMAS, et al.,
Class Representative Plaintiffs

/s/ Jeffrey A. Leon
Jeffrey A. Leon
Jamie E. Weiss
Zachary A. Jacobs
QUANTUM LEGAL LLC
513 Central Avenue, Suite 300
Highland Park, Illinois 60035
(847) 433-4500

Richard J. Burke
QUANTUM LEGAL LLC
1010 Market Street, Suite 1310
St. Louis, MO 63101

Jonathan Shub
KOHNSWIFT AND GRAF, P.C.
One South Broad Street, Suite 2100
Philadelphia, Pennsylvania 19107
(215) 238-1700

Attorneys for Plaintiffs and Proposed Classes

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the following document:

**PLAINTIFFS' MOTION FOR LEAVE TO FILE AN OVERSIZED MEMORANDUM IN
SUPPORT OF THEIR MOTION FOR PRELIMINARY APPROVAL OF THE CLASS
SETTLEMENT**

was served on June 28, 2015, in accordance with FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Jeffrey A. Leon
Jeffrey A. Leon